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ALABAMA JUDICIAL DATA CENTER
RUSSELL COUNTY

SUMMONS

CV 2006 000030.00
ALBERT L. JOHNSON

IN THE CIRCUIT COURT OF RUSSELL COUNTY

CYNTHIA GEIGER ET AL VS RYAN FULLER SMALLWOOD

SERVE ON: (D001)

PLAINTIFF'S ATTORNEY

SMALLWOOD RYAN FULLER
973 LISMORE DRIVEPARR BENJAMIN HOWARD
P O BOX 1971

COLUMBUS, GA 31904-0000

TUSCALOOSA, AL 35403-0000

TO THE ABOVE NAMED DEFENDANT:

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS, YOU OR YOUR ATTORNEY ARE REQUIRED TO MAIL OR HAND DELIVER A COPY OF A WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT TO THE PLAINTIFFS ATTORNEY(S) SHOWN ABOVE OR ATTACHED:

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGEMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. YOU MUST ALSO FILE THE ORIGINAL OF YOUR ANSWER WITH THE COURT BELOW.

() TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY EITHER RULES 4.1(B)(2) OR 4.2(B)(2) OR 4.4(B)(2) OF THE ALABAMA RULES OF CIVIL PROCEDURE: YOU ARE HEREBY COMMANDED TO SERVE THIS SUMMONS AND A COPY OF THE COMPLAINT IN THIS ACTION UPON DEFENDANT.

(P) THIS SERVICE BY CERTIFIED MAIL OF THIS SUMMONS IS INITIATED UPON THE WRITTEN REQUEST OF _____ PURSUANT TO RULE 4.1(C) OF THE ALABAMA RULES OF CIVIL PROCEDURE.

DATE: 01/30/2006

CLERK: KATHY COULTER

BY: *RLP*PO BOX 518
PHENIX CITY AL 36868-0510
(334) 298-0516

RETURN ON SERVICE:

() CERTIFIED MAIL RETURN RECEIPT IN THIS OFFICE ON (DATE) _____
(RETURN RECEIPT HERETO ATTACHED)

() I CERTIFY THAT I PERSONALLY DELIVERED A COPY OF THE SUMMONS AND COMPLAINT TO _____

IN _____ COUNTY, ALABAMA ON (DATE) _____

DATE

SERVER SIGNATURE

SERVER ADDRESS

TYPE OF PROCESS SERVER

OPERATOR: ANL
PREPARED: 01/30/2006

**IN THE CIRCUIT COURT
FOR RUSSELL COUNTY, ALABAMA**

CYNTHIA GEIGER and

CRYSTAL DAVIS,

PLAINTIFFS

V.

RYAN FULLER SMALLWOOD,

DEFENDANT.

CIVIL ACTION NO. CN-06-30

FILED IN OFFICE
2006 JAN 30 PM 2:41
U.S. DIST. COURT
SOUTHERD DIST. OF ALA.
RUSSELL CO., ALA.

COMPLAINT


COMES NOW the Plaintiffs, **CYNTHIA GEIGER AND CRYSTAL DAVIS**, by and through their attorney Benjamin H. Parr, and allege the following:

1. Plaintiff Cynthia Geiger is an adult over the age of nineteen (19) years of age, and a resident of Russell County, Alabama.
2. Plaintiff Crystal Davis is an adult over the age of nineteen (19) years of age and a resident of Russell County, Alabama.
3. Defendant Ryan Smallwood is, on information and belief, a resident of Muscogee County, Georgia over the age of nineteen (19) years of age.
4. On or about 24 September 2004, upon a public highway, U.S Highway 431, Phenix City, Russell County, Alabama, the Defendant negligently and or wantonly caused or allowed a motor vehicle driven by Defendant to collide with a motor vehicle driven by Plaintiff Cynthia Geiger and occupied by Plaintiff Crystal Davis.
5. As a proximate result of the Defendant's said negligence and or wantonness, the Plaintiffs were caused to incur medical expenses in excess of \$25,000.
6. As a proximate result of the Defendant's said negligence and or wantonness, the Plaintiffs will incur future medical expenses for treatment of injuries caused by Defendant's negligence.

7. As a proximate result of the Defendant's said negligence and or wantonness, the Plaintiffs were caused to experience physical pain and suffering, and will continue to experience physical pain and suffering in the future.

8. As a proximate result of the Defendant's said negligence and or wantonness, the Plaintiffs were caused to suffer mental distress and anguish and will continue to suffer mental distress and anguish in the future.

WHEREFORE, Plaintiffs demand judgment against Defendant in the amount of \$200,000 plus costs, interest, attorney's fees, and any other relief to which Plaintiff may be entitled and the Court deems just and proper.


Benjamin H. Parr (PAR-112)
Attorney for Plaintiff

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